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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CECILIA RAMOS,

Plaintiff,

v.

**CREDIT MANAGEMENT, LP.,
SYNCHRONY BANK, WELLS
FARGO FINANCIAL NEVADA,
INC., and EXPERIAN
INFORMATION SOLUTIONS,
INC.**

Defendants.

Case No.: 2:15-cv-00277-APG-GWF

**STIPULATION AND
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT WELLS FARGO
FINANCIAL NEVADA, INC.'S
MOTION TO DISMISS**

[THIRD REQUEST]

Plaintiff, CECILIA RAMOS (“Plaintiff”), and Defendant, WELLS FARGO FINANCIAL NEVADA, INC. (“Wells Fargo”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Wells Fargo’s Motion to Dismiss. The current deadline is set for July 6, 2015.

1. Plaintiff’s Complaint was filed on February 17, 2015. [Dkt. No. 1]
2. Wells Fargo filed its Motion to Dismiss [Dkt. No. 12] on May 22, 2015.
3. Plaintiff and Wells Fargo have agreed to an extension of time of 30 days, up to and including August 5, 2015 for Plaintiff to respond to Wells Fargo’s Motion To Dismiss.
4. This second request is not made for purposes of delay, but rather to allow the parties to explore and potential resolve this matter.

The parties therefore respectfully request this Court enter an order granting an extension of time of 30 days, up to and including August 5, 2015, for Plaintiff to respond to Wells Fargo’s Motion to Dismiss.

DATED: July 6, 2015

SNELL & WILMER

/s/ Karl Riley _____
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/s/ DANNY J. HOREN _____
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IT IS SO ORDERED:

Plaintiff shall have 30 days, up to and including August 5, 2015, to respond to Wells Fargo's Motion to Dismiss.



UNITED STATES DISTRICT COURT JUDGE

DATED: July 7, 2015

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: June 22, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen
DANNY HOREN, ESQ.
ATTORNEY FOR PLAINTIFF